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**From:** Rice, Scott [Rice.Scott@epa.gov]  
**Sent:** 3/13/2017 3:12:59 PM  
**To:** Pratt, Stacie [Pratt.Stacie@epa.gov]  
**Subject:** Fw: WWTU\_Soil\_Management\_Plan\_Momentive\_2-03-17.pdf  
**Attachments:** Statement of Basis MPM Silicones 061907 A Highlight.pdf

Hi Stacie. The info regarding PCBs in the Statement of Basis is on page 12. The Soil Management Plan (done by Momentive) indicates the PCB concentrations in soil where the proposed WWTP construction is to occur. Let me know if you need additional information. regards

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**From:** McDougal, Jason S <Jason.S.McDougal@wv.gov>  
**Sent:** Wednesday, March 8, 2017 10:26 AM  
**To:** Rice, Scott  
**Subject:** RE: WWTU\_Soil\_Management\_Plan\_Momentive\_2-03-17.pdf

Scott,

Here is the SB. I could only find mention of PCBs in three samples. All under 50 ppm. I can't find the RFI for the site. I highlighted the section with the reference to PCBs.

Jason (Jake) McDougal  
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**From:** Rice, Scott [mailto:Rice.Scott@epa.gov]  
**Sent:** Wednesday, March 8, 2017 9:08 AM  
**To:** McDougal, Jason S <Jason.S.McDougal@wv.gov>  
**Subject:** Re: WWTU\_Soil\_Management\_Plan\_Momentive\_2-03-17.pdf

Hi Jason, hope all is well. Thanks for the plan. It gives me a better idea on what's going on for sure. Momentive is going to have to submit to EPA a Self-implementing PCB cleanup plan under the auspices of 40 CFR 761.61. Most of the elements of such a plan are already included in their Soil Management Plan, but the self-implementing plan will require information regarding the source of the contamination, potential groundwater impact, extent of contamination, etc. For instance, if the source of the contamination was the same for all the contamination in the proposed WWTP area, then everything coming out of that area is considered PCB remediation waste and none of it can go to a municipal landfill due to anti-dilution regulations. They can't segregate contamination based on as-found concentrations if. The source was evidently greater than 50 ppm (analytical max is 1744 ppm as far as I can tell). I'll wait to hear from Mr. Garner to make an assessment as to whether the extent of contamination has been completely defined, but that is another element of the self-implementing PCB cleanup regs. There are also Land-Use Covenants/Deed Restrictions that may come into play if Momentive elects to leave some of the contamination

behind. Anyway, I'll see what John sends me then we can all chat about it to make sure it moves forward. best regards

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**From:** McDougal, Jason S <[Jason.S.McDougal@wv.gov](mailto:Jason.S.McDougal@wv.gov)>

**Sent:** Tuesday, March 7, 2017 5:19:24 PM

**To:** Rice, Scott

**Subject:** WWTU\_Soil\_Management\_Plan\_Momentive\_2-03-17.pdf

Scott,

Good to hear from you. Here is all I have available on my phone at this time. It is the Soil Management Plan. The PCBs were not included in the SB. I don't know why. I will try to call tomorrow. I will be out of the office, but I can probably find some time.  
304-389-7596